

PATE, JOHNSON & CHURCH

October 15, 2021

VIA ECF AND EMAIL

Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

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| USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>10/15/2021</u> |
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**Re: United States v. Christopher Oakes
20 Cr. 160 (MKV)
Request to Travel**

Dear Judge Vyskocil:

I write on behalf of my client, Mr. Christopher Oakes, who has been released on bond during the pendency of the above-referenced case. The conditions of Mr. Oakes's bond currently restrict his travel to the Southern District of Florida, the Southern District of New York, the Eastern District of Pennsylvania, and districts "intermediate" to these. We respectfully seek permission for Mr. Oakes to travel to Atlanta, Georgia from October 19, 2021 to October 21, 2021, so that he may be physically present in my office for the hearing on his change of plea that is scheduled for October 20, 2021.

Mr. Oakes's upcoming hearing is set to be handled virtually. Due to COVID-19-related travel restrictions, Mr. Oakes and I have not been able to meet in person to review the plea documents. Allowing Mr. Oakes to be in the presence of his attorneys before and during his change of plea hearing will afford him the opportunity to review the relevant documents, ask any questions he may have regarding the documents or these proceedings, and seek any necessary clarification before and during the change of plea hearing. Counsel for Mr. Oakes also notes that that technology available in our office will allow Mr. Oakes to appear for his hearing in the presence of his attorneys on one camera and allow for a more efficient presentation during the hearing than if Mr. Oakes participated in the proceedings from his home.

During his time in Georgia, Mr. Oakes would stay at The Westin Peachtree Plaza, 210 Peachtree Street NW, Atlanta, GA 30303. He would travel to Atlanta by aircraft via American Airlines and arrive on October 19, 2021. He would then attend the change of plea from my office, which is located at 101 Marietta Street NW, Suite 3300 in Atlanta, Georgia. Finally, he would return promptly to his home in Wilkes-Barre, Pennsylvania by aircraft via American Airlines on October 21, 2021.

I have conferred with AUSA Andrew Adams and Mr. Oakes's pretrial services officer, Maureen Harrity-Jones, and neither of them have any objections to this request.

Thank you for your consideration.

Respectfully submitted,

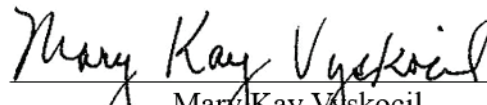
/s/

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cc: Mr. Andrew Adams, Assistant United States Attorney (via ECF)
Ms. Maureen Harrity-Jones, Pretrial Services Officer (via email)

Granted. SO ORDERED.

Date: October 15, 2021
New York, New York


Mary Kay Vyskocil
United States District Judge